

1 DAMIEN J. MARSHALL (admitted *pro hac vice*)  
dmmarshall@kslaw.com  
2 ANDREW MICHAELSON (admitted *pro hac vice*)  
amichaelson@kslaw.com  
3 KING & SPALDING LLP  
1185 Avenue of the Americas, 34th Floor  
4 New York, NY 10036  
Tel: (212) 556-2100; Fax: (212) 556-2222  
5  
6 SUZANNE E. NERO (SBN 284894)  
snero@kslaw.com  
7 MEGHAN H. STRONG (SBN 324503)  
mstrong@kslaw.com  
KING & SPALDING LLP  
8 50 California Street, Suite 3300  
San Francisco, CA 94111  
9 Tel: (415) 318-1200; Fax: (415) 318-1300

10 ANDREW J. CERESNEY (admitted *pro hac vice*)  
aceresney@debevoise.com  
11 DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
12 New York, NY 10022  
Tel: (212) 909-6000; Fax: (212) 909-6836  
13

14 *Attorneys for Defendants Ripple Labs Inc.,*  
*XRP II, LLC, and Bradley Garlinghouse*  
15

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 OAKLAND DIVISION

19 In re RIPPLE LABS INC. LITIGATION  
20

21 This Document Relates to:  
22

23 ALL ACTIONS  
24

25 Case No. 4:18-cv-06753-PJH

**DECLARATION OF MEGHAN H.  
STRONG IN RELATION TO  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED**

26  
27  
28

1 I, Meghan H. Strong, declare as follows:

2       1. I am a member of the bar of the State of California, an associate with the law firm  
 3 of King & Spalding LLP, and counsel of record for Defendants Ripple Labs Inc., XRP II, LLC,  
 4 and Bradley Garlinghouse (collectively, “Ripple”). I make this declaration pursuant to Northern  
 5 District of California Civil Local Rule 79-5, in relation to Ripple’s Administrative Motion to  
 6 Consider Whether Another Party’s Material Should be Sealed (ECF No. 200). Based on my  
 7 personal experience, knowledge, and review of the files, records, and communications in this case,  
 8 I have personal knowledge of the facts set forth in this Declaration and, if called to testify, could  
 9 and would testify competently to those facts under oath.

10      2. Defendants filed their Opposition to Lead Plaintiff’s Motion for Class  
 11 Certification and related filings on February 3, 2023 (ECF No. 201).

12      3. Because these filings contained materials that other parties and third parties had  
 13 designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES  
 14 ONLY” under the Stipulated Protective Order as Modified by the Court (“Protective Order”)  
 15 (ECF No. 143), Ripple filed an Administrative Motion to Consider Whether Another Party’s  
 16 Material Should be Sealed (“Administrative Motion”) (ECF No. 200). Among the documents  
 17 Ripple filed under seal were nearly 3,500 affidavits, filed as 26 separate exhibits—Exhibits 26  
 18 through 51—due to their volume. These affidavits had been signed by various individuals who  
 19 state they hold or held XRP and were also submitted and filed under seal in *SEC v. Ripple Labs*  
 20 *et al.*, No. 1:20-cv-10832 (S.D.N.Y.) (the “SEC Action”).

21      4. Pursuant to Local Rule 79-5(f), Ripple gave notice to and conferred with counsel  
 22 for these third party affiants regarding the Administrative Motion and sealed affidavits. Counsel  
 23 for the third-party affiants informed counsel for Ripple that he has no objection to Exhibits 26  
 24 through 51 being filed publicly so long as the Personal Identifiable Information (“PII”) of the  
 25 affiants, including their names and addresses, is redacted.

26      5. PII is properly redacted under Federal Rule of Civil Procedure 5.2 and also  
 27 satisfies the Ninth Circuit standard for sealing. *See Kamakana v. City & Cnty. of Honolulu*, 447  
 28

<sup>1</sup> F.3d 1172, 1182 (9th Cir. 2006); *see also Cancino Castellar v. Mayorkas*, No. 17-CV-00491-BAS-AHG, 2021 WL 3678440, at \*34 (S.D. Cal. Aug. 19, 2021).

3       6. Accordingly, attached hereto are true and correct copies of Exhibits 26 through 51  
4 with all PII redacted.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
6 10th day of February, 2023, in San Francisco, California.

Dated: February 10, 2023

KING & SPAULDING LLP

*/s/ Meghan H. Strong*

MEGHAN H. STRONG (SBN 324503)  
mstrong@kslaw.com  
KING & SPALDING LLP  
50 California St., Suite 3300  
San Francisco, CA 94111  
Tel: (415) 318-1200; Fax: (415) 318-1300

*Attorney for Defendants Ripple Labs Inc.,  
XRP II, LLC, and Bradley Garlinghouse*